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MATTER NO.

296-001

February 14, 2023

VIA CM/ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

RE: Flynn v. Cable News Network, Inc.
Case 1:21-cv-02587 (GHW/SLC)

Dear Judge Cave:

I represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter. Pursuant to § I(A) and II(C)(2) of the Court’s Individual Practices, I request a discovery conference with the Court to obtain an order compelling Defendant Cable News Network, Inc. (“CNN”) to produce available dates for the deposition of Anderson Cooper.

Mr. Cooper is a witness with information relevant to the facts alleged in Plaintiffs’ amended complaint, including the matters stated in ¶¶ 2 and 15. Mr. Cooper also has knowledge of the QAnon belief system as described by Donie O’Sullivan in the following video: <https://www.youtube.com/watch?v=gufvLjAQsQs>.

Certification

Pursuant to Local Civil Rule 37.2, counsel for the Plaintiff requested dates for the deposition of Anderson Cooper on January 23, 2023 and January 31, 2023, and a telephonic conference to discuss CNN’s refusal to provide dates. Counsel for CNN completely ignored the matter, and has failed to provide dates. The parties are at an impasse.

Yours very truly,

/s/ Steven S. Biss

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cc. Anthony C. Carlini, Jr., Esq.